

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA §

vs. § CRIMINAL NO. B-25-138

LEONARDO BAEZ-LARA §
NORA ALICIA AVILA-GUEL

GOVERNMENT'S NOTICE OF INTENT TO OFFER EXTRANEous OFFENSES

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States Attorney for the Southern District of Texas, by and through the undersigned Assistant United States Attorneys, and files this notice to defendants.

The Government may intend to use one or more of the following extraneous offenses in this trial to show motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, as provided by Rule 404(b) of the Rules of Evidence.

Defendants' knowledge of illegal status based on their failure to file Employment Eligibility Verification (USCIS Form I-9) employment record for employees unauthorized to work in the United States. Statement(s) made during interview of Defendants:

Offense: Failure to fill out or file USCIS Form I-9 for employees unauthorized to work in the United States but employed under AB LLC

Date of Offense: on or about February 2025

Date of Conviction: None

Jurisdiction: Cameron County, Texas

Offense: Failure to participate in H-2B Program or any other non-immigrant visa program, or use E-Verify in hiring process

Date of Offense: on or about February 2025

Date of Conviction: None

Jurisdiction: Cameron County, Texas

The Government respectfully gives notice of the possible use of any of the above-mentioned extraneous offenses. Additionally, the Government will approach the court before questioning any witness in regard to these offenses.

Respectfully submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS

s/ Paul Marian

PAUL MARIAN
Assistant U.S. Attorney
State Bar No. 24078919
Federal Bar No. 3312749
&

s/ Baltazar Salazar

BALTAZAR SALAZAR
Assistant U.S. Attorney
State Bar No. 24106385
Federal Bar No. 3135288
600 E. Harrison, Ste. 201
Brownsville, TX 78520

CERTIFICATE OF SERVICE

I, hereby certify that on **June 17, 2025**, a copy of Government's Notice of Intent to Offer Extraneous Offenses was sent to defense counsel, via Notification of Electronic Filing.

s/ Paul Marian

PAUL MARIAN
Assistant U.S. Attorney